

EXHIBIT 116

Highly Confidential - Subject to Further Confidentiality Review

REDACTED



Page 1

Highly Confidential - Subject to Further Confidentiality Review

<p style="text-align: right;">Page 206</p> <p>1 the form.</p> <p>2 THE WITNESS: Can you define</p> <p>3 diversion for me, your definition of</p> <p>4 diversion?</p> <p>5 QUESTIONS BY MR. MOUGEY:</p> <p>6 Q. You want me to define diversion</p> <p>7 for you?</p> <p>8 A. Because it can mean so many</p> <p>9 different things. That's why I'm asking.</p> <p>10 Q. Pills that are not ending up in</p> <p>11 a legitimate home and out into the stream of</p> <p>12 commerce. Did -- that pills were being</p> <p>13 diverted from legitimate patients into the</p> <p>14 hands of kids, that were being diverted into</p> <p>15 the hands of drug dealers and making their</p> <p>16 way into other states.</p> <p>17 MR. STOFFELMAYR: Objection to</p> <p>18 the form.</p> <p>19 THE WITNESS: So are you asking</p> <p>20 me if I was aware that that was</p> <p>21 happening?</p> <p>22 QUESTIONS BY MR. MOUGEY:</p> <p>23 Q. Yes, sir.</p> <p>24 A. Yes, I was aware that people</p> <p>25 were using opioid medications not for their</p>	<p style="text-align: right;">Page 208</p> <p>1 narcotics?</p> <p>2 MR. STOFFELMAYR: Objection to</p> <p>3 the form.</p> <p>4 THE WITNESS: I personally did</p> <p>5 not, no.</p> <p>6 QUESTIONS BY MR. MOUGEY:</p> <p>7 Q. You never went back and looked</p> <p>8 prior to '13 what Walgreens was doing prior</p> <p>9 to the agreed-upon creation of the</p> <p>10 pharmaceutical integrity department?</p> <p>11 A. That was not part of my role,</p> <p>12 so, no, I did not.</p> <p>13 Q. Did you ask anybody, Well, what</p> <p>14 were we doing before the pharmaceutical</p> <p>15 integrity department was created by agreement</p> <p>16 between the DEA and Walgreens?</p> <p>17 A. I did not.</p> <p>18 Q. You never went back and looked</p> <p>19 at the systems in place to avoid diversion</p> <p>20 prior to you starting in the pharmaceutical</p> <p>21 integrity department?</p> <p>22 MR. STOFFELMAYR: Objection to</p> <p>23 the form.</p> <p>24 Go ahead.</p> <p>25 THE WITNESS: That was not part</p>
<p style="text-align: right;">Page 207</p> <p>1 intended use.</p> <p>2 Q. And not just for -- not just</p> <p>3 for their intended use, but were you aware</p> <p>4 that Florida was the epicenter of a notorious</p> <p>5 well-documented epidemic of description drug</p> <p>6 abuse, and those pills were migrating to</p> <p>7 other states?</p> <p>8 A. I was made aware of that during</p> <p>9 my time in pharmaceutical integrity.</p> <p>10 Q. So not until 2013?</p> <p>11 A. Correct.</p> <p>12 Q. And, sir, what were you told by</p> <p>13 Walgreens about the migration of pills from</p> <p>14 Florida pharmacies into other states?</p> <p>15 A. We were made aware of some of</p> <p>16 the drug-seeking behavior of some of the</p> <p>17 patients and how -- some of the techniques</p> <p>18 that they use to obtain prescriptions not for</p> <p>19 a legitimate medical purpose and made aware</p> <p>20 of some prescribers that were not writing</p> <p>21 prescriptions for legitimate medical purpose.</p> <p>22 Q. So at that point in time, in</p> <p>23 2013, did you make a study or analyze the</p> <p>24 systems set in place at Walgreens to minimize</p> <p>25 or avoid the diversion of Schedule II and III</p>	<p style="text-align: right;">Page 209</p> <p>1 of my role, no.</p> <p>2 QUESTIONS BY MR. MOUGEY:</p> <p>3 Q. Have you ever looked through</p> <p>4 this document that I have in front of you and</p> <p>5 identified the discussion about the migration</p> <p>6 of pills from Florida pharmacies to other</p> <p>7 states?</p> <p>8 A. No.</p> <p>9 Q. Are you aware of how big a</p> <p>10 problem it was in Florida that pills were</p> <p>11 migrating from Florida pharmacies to other</p> <p>12 states?</p> <p>13 A. I was not aware of the size of</p> <p>14 the problem, no.</p> <p>15 Q. If you would, sir, please turn</p> <p>16 to page 41, and it says, "Summary of</p> <p>17 testimony." It's the Deputy Assistant</p> <p>18 Administrator, Joseph Rannazzisi, says he's</p> <p>19 from the DEA.</p> <p>20 Do you see that, sir?</p> <p>21 A. Yes.</p> <p>22 Q. And, sir, this is a submission</p> <p>23 from the government's prehearing statement.</p> <p>24 Do you see that, sir?</p> <p>25 A. I do.</p>

53 (Pages 206 to 209)